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Attorneys for Defendant Scott M. Colabella, in his official capacity as Ocean County Clerk

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSEPH
MARCHICA, KEVEN MCMILLAN,
ZINOVIA SPEZAKIS, and NEW JERSEY
WORKING FAMILIES ALLIANCE, INC.

Plaintiff,

vs.

CHRISTINE GIORDANO HANLON, in
her official capacity as
Monmouth County Clerk, SCOTT M.
COLABELLA, in his official
capacity as Ocean County Clerk,
and PAULA SOLLAMI COVELLO, in
her official capacity as Mercer
County Clerk, JOHN S. HOGAN, in
his official capacity as Bergen
County Clerk, EDWARD P.
MCGETTIGAN, in his official
capacity as Atlantic County
Clerk, and E. JUNIOR MALDONADO,
in his official capacity as
Hudson County Clerk,

Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**Civil Action No.: 3:20-cv-
08267-FLW-TJB**

Civil Action

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT PURSUANT
TO F.R.C.P. 12(b)(1) &
12(b)(6)**

TO: **Brett M. Pugach, Esq.**
Bromberg Law LLC
41 West 43rd Street, Suite 32
New York, NY 10036-7424

PLEASE TAKE NOTICE that on a date to be determined by the court, the undersigned applies for an Order dismissing Plaintiff's Complaint.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the brief in support of this motion submitted simultaneously herewith.

A proposed form of order accompanies this motion.

PLEASE TAKE FURTHER NOTICE that if an opposition brief is filed thereto this party requests oral argument pursuant to L. Civ. R. 78.1(b).

RESPECTFULLY SUBMITTED,
BERRY SAHRADNIK KOTZAS & BENSON

By: /s/ Mathew B. Thompson
Mathew B. Thompson, Esq.

DATED: March 29, 2021